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ATTORNEYS FOR DEFENDANTS

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CARMELO MILLAN, individually, and on Behalf  
of All Other Persons Similarly Situated,  
Plaintiffs,

vs.

CITIGROUP, INC.,  
CITIGROUP TECHNOLOGY, INC.

Defendants.

Civil Action No. 07-CIV-3769

*Electronically Filed*

**AFFIDAVIT OF SARAH E. PONTOSKI**

COMMONWEALTH OF PENNSYLVANIA )  
   ) ss.  
COUNTY OF PHILADELPHIA         )

SARAH E. PONTOSKI, being duly sworn, deposes and says:

1. I am an associate with the law firm of Morgan, Lewis & Bockius LLP, attorneys for the Defendants, Citigroup Inc. and Citigroup Technology, Inc., in this proceeding. I am resident in the firm's Philadelphia office, located at 1701 Market Street, Philadelphia, Pennsylvania 19103 and submit this affidavit in support of Defendants' Motion for Summary Judgment.

2. Attached as Exhibit A is a true and correct copy of selected pages from Plaintiff's deposition transcript, and accompanying deposition exhibits taken January 16, 2008.

3. Attached as Exhibit B is a true and correct copy of selected pages from Thomas Saranello's deposition transcript, and accompanying deposition exhibits taken February 7, 2008.

4. Attached as Exhibit C is a true and correct copy of selected pages from Amedeo Discepelo's deposition transcript taken February 20, 2007.

5. Attached as Exhibit D is a true and correct copy of an e-mail from Thomas Saranello to Plaintiff, July 17, 2003, which is labeled CTI00001486.

6. Attached as Exhibit E is a true and correct copy of an e-mail from Plaintiff to Thomas Saranello, et al., July 27, 2005, which is Bates labeled CTI00001377-1379.

7. Attached as Exhibit F is a true and correct copy of an e-mail from Thomas Saranello to Plaintiff, September 29, 2005, which is Bates labeled CTI00001435.

8. Attached as Exhibit G is a true and correct copy of an e-mail from Thomas Saranello to Plaintiff, August 24, 2006, which is Bates labeled CTI000001886.

9. Attached as Exhibit H is a true and correct copy from Cisco's website, describing the Interconnecting Cisco Network Devices certification.

10. Attached as Exhibit I is a true and correct copy from Cisco's website, describing the CISCO Certified Network Associate certification.

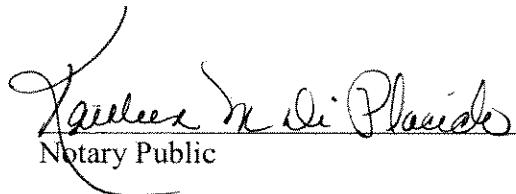
11. This affidavit is based upon my own personal knowledge, and/or upon my review of what I believe to be true and correct copies of documents kept in the normal course of business by Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Philadelphia, Pennsylvania  
February 22, 2008

  
Sarah E. Pontoski

Sworn to and subscribed before  
me this 22nd day of February, 2008.

  
Kathleen M. DiPlacido  
Notary Public

